

[illegible]

After receiving multiple orders from the Court to respond to outstanding motions and warnings about the consequences for failing to do so, the Clerk of the Court entered default against TLW Energy Service, LLC and Troy Watkins on February 25, 2023.

III

Therefore, TLW has by default admitted the allegations in the plaintiff's complaint.

IV

Because they were awarded damages in a related proceeding, Forrest, Glasson, Frakes and Maness request that their claims against TLW be dismissed.

V

Under 29 U.S.C. § 216(b), Edge, Vara, Newman, Rodriguez, Cuellar and Gonzales request that they be awarded \$240,477.38 in unpaid overtime wages, \$240,477.38 in liquidated damages plus attorney's fees in the amount \$47,500.00. Ex. A, Edge Decl. (Aug. 3, 2023); Ex. B, Vara Decl. (Aug. 3, 2023); Ex. C, Newman Decl. (Aug. 3, 2023); Ex. D, Rodriguez Decl. (Aug. 3, 2023); Ex. E, Cuellar Decl. (Aug. 3, 2023); Ex. F, Gonzales Decl. (Aug. 3, 2023); Ex. G, Decl. re: Attorney's Fees.

VI

Watkins is not on active duty in the armed forces. Ex. H, Decl. re: Military Status.

* * *

For these reasons, the Court should enter default judgment against TLW.

Respectfully Submitted,

MOORE & ASSOCIATES
Lyric Centre
440 Louisiana Street, Suite 1110
Houston, Texas 77002
Telephone: (713) 222-6775
Facsimile: (713) 222-6739

By: 

Melissa Moore
Tex. Bar No. 24013189
melissa@mooreandassociates.net
Curt Hesse
Tex. Bar No. 24065414
curt@mooreandassociates.net

ATTORNEYS FOR PLAINTIFFS